

THE LAW OFFICES OF PETER E. ZIMNIS

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PETER E. ZIMNIS
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March 9, 2012

Clerk, U.S. Bankruptcy Court
402 East State Street
Trenton, New Jersey 08608

Re: Drager
Chapter 7 Case No.: 11-42200 KCF

Dear Clerk:

In reference to the above named case, enclosed please find a Notice of Motion for Damages due to a Violation of the Automatic Stay; a Certification by the debtor, along with a form of Order.

Kindly contact this Office should you have any questions.

Very truly yours,

Law Office of Peter E. Zimnis

By: /s/ John Zimnis
John Zimnis, Esq.

c. Chapter 7 Trustee
H&R Block Bank

LAW OFFICES OF PETER E. ZIMNIS
1245 Whitehorse Mercerville Rd, Suite 412
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609-581-9353
Attorney for Debtor(s)

WAYNE & CHRISTINE	:	UNITED STATES BANKRUPTCY COURT
DRAGER	:	DISTRICT OF NEW JERSEY
Debtor	:	CHAPTER 7
	:	CASE NO.: 11-42200 KCF
	:	
	:	MOTION FOR DAMAGES FOR VIOLATION
	:	OF THE AUTOMATIC STAY
	:	ORAL ARGUMENT: Waived unless opposed

NOTICE OF MOTION FOR DAMAGES FOR A VIOLATION
OF THE AUTOMATIC STAY

To: H&R Block Bank
Attn: Corporate Officer and/or
Managing Agent
PO Box 7235
Sioux Falls, SD 57117

H&R Block Bank
Attn: Corporate Officer and/or
Managing Agent
PO Box 3052
Milwaukee, WI 53201

PLEASE TAKE NOTICE that on **April 10, 2012, at 10:00 a.m.**, or as soon thereafter as counsel may be heard, the undersigned will apply to the Honorable Judge presiding at such time, sitting at the United States Bankruptcy Court located at Trenton, New Jersey for an Order for Damages due to a Violation of the Automatic Stay.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney.

If you do not want the Court to grant damages in favor of the debtor, and if you want the Court to consider your views on the Motion, then you or your attorney must file a written response or an answer explaining your position with the Clerk of the Bankruptcy Court. If you mail a copy to the Court, then you must also mail a copy to the debtor's counsel.

Take further notice that the debtor will rely upon the attached Certification. Also take notice that answering papers and briefs (if necessary) or a statement that no answering brief is necessary and the basis thereof, shall be filed seven (7) days before the date noticed for argument. This Motion shall be deemed uncontested unless responsive are filed with seven (7) days from the date of this Motion and state with particularity the basis for the opposition.

The facts that the moving party relies upon as set forth in the accompanying Certification and the basis for the moving party's request is clearly set forth in the aforesaid papers as required by the Federal Bankruptcy Rules and the Local Rules. As the issues at hand do not present complicated questions of fact or unique questions of law, it is hereby submitted that no brief is necessary to aid the Court in deciding the Motion.

In support of this motion, the moving party will rely upon the information contained in attached documents along with arguments of counsel and testimony to be produced at the time aforesaid hearing.

Law Offices of Peter E. Zimnis
Counsel for Debtor(s)

By: /s/ John Zimnis
John Zimnis, Esq.

Dated: